



United States Department of State

Washington, D.C. 20520

October 14, 2011

Ruby J. Krajick
Clerk of Court
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: Deborah Peterson, et al., v. Islamic Republic of Iran, et al.,
Case Number 10-cv-4518**

Dear Ms.Krajick:

I am writing regarding the Court's request for service of a summons, complaint and notice of suit pursuant to 28 U.S.C. 1608(a)(4) upon the Iranian Ministry of Information and as a defendant in the above referenced lawsuit.

Because the United States does not maintain diplomatic relations with the government of Iran, the Department of State is assisted by the Foreign Interests Section of the Embassy of Switzerland in Tehran in delivering these documents to the Iranian Ministry of Foreign Affairs. The documents were delivered to the Iranian Ministry of Foreign Affairs under cover of diplomatic note number 1084-IE, dated July 11, 2011 and delivered July 12, 2011. A certified copy of the diplomatic note is enclosed.

Should you have any questions regarding this matter, please do not hesitate to contact me at (202) 736-9115.

Sincerely,

A handwritten signature in black ink, appearing to read "William P. Fritzlen".

William P. Fritzlen
Attorney Adviser

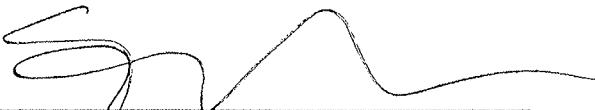
Office of Policy Review and Interagency Liaison

Cc: Liviu Vogel
Salon Marrow Dyckman Newman and Broudy, LLP
292 Madison Avenue
New York, NY 10017

SPECIFIC AUTHENTICATION CERTIFICATE

federation of Switzerland)
n, Canton of Bern) SS:
Embassy of the United States of America)

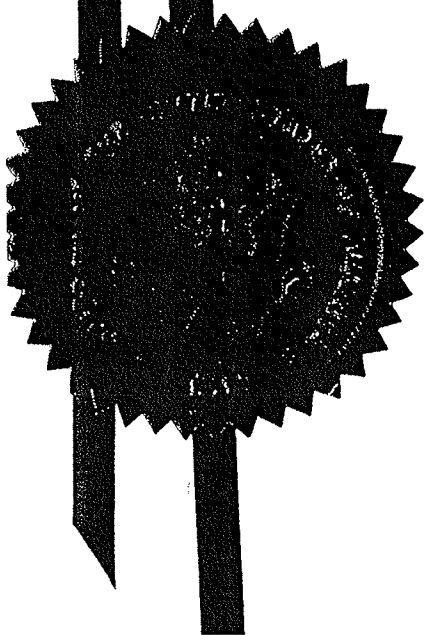
I, S. Seth Kolb, a consular officer at the Embassy of the United States at Bern, Switzerland, certify that this is a true copy of Embassy note number 20488 dated July 5, 2011, which was transmitted to the Swiss Ministry of Foreign Affairs on July 6, 2011 for further transmission to the American Interests Section of the Swiss Embassy in Tehran, Iran.


(Signature of Consular Officer)

S. Seth KOLB
(Typed name of Consular Officer)

Vice Consul of the United States of America
(Title of Consular Officer)

September 15, 2011
(Date)



Embassy of the United States of America



July 5, 2011

CONS NO. 20488

Federal Department of Foreign
Affairs
Foreign Interests Service
Bundeshaus Nord
3003 Bern

Subject: JUDICIAL ASSISTANCE: Service of process under the
Foreign Sovereign Immunities Act (FSIA) - Debora D. Peterson,
et al. v. The Islamic Republic of Iran, et al., Case No. 10
CIV 4518

REF: ----

The Department of State has requested the delivery of the
enclosed Summons, Complaint and Notice of Suit to the
Ministry of Foreign Affairs of the Islamic Republic of Iran
pursuant to the Foreign Sovereign Immunities Act in the
matter of Debora D. Peterson, et al. v. The Islamic Republic
of Iran, et al., Case No. 10 CIV 4518.

The Embassy is herewith requesting the Swiss Ministry of
Foreign Affairs to transmit the documents to the American
Interests Section of the Swiss Embassy in Tehran. The
Islamic Republic of Iran is a defendant in this case. The
American Interests Section should transmit the Summons,
Complaint and Notice of Suite to the Iranian Ministry of
Foreign Affairs under cover of a diplomatic note utilizing
the language provided in the enclosed instruction.

Transmittal should be done in a manner which enables the
Embassy to confirm delivery. The American Interests Section
should execute a certification of the diplomatic note, which
will be forwarded by the Department of State to the
requesting court in the United States.

Enclosed is the appropriate part of a message the Embassy received from the Department of State as well as one set of documents for the Islamic Republic of Iran.

The Embassy would appreciate being informed of the date the American Interests Section of the Swiss Embassy in Tehran receives the documents as well as the date the Interests Section forwards the documents to the Iranian authorities.

SPP's assistance is much appreciated.

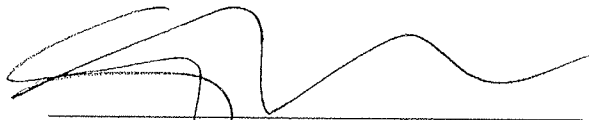


SPECIFIC AUTHENTICATION CERTIFICATE

Federation of Switzerland)
n, Canton of Bern) SS:
Assy of the United States of America)

rtify that the annexed document bears the genuine seal
f the Swiss Federal Department of Foreign Affairs.

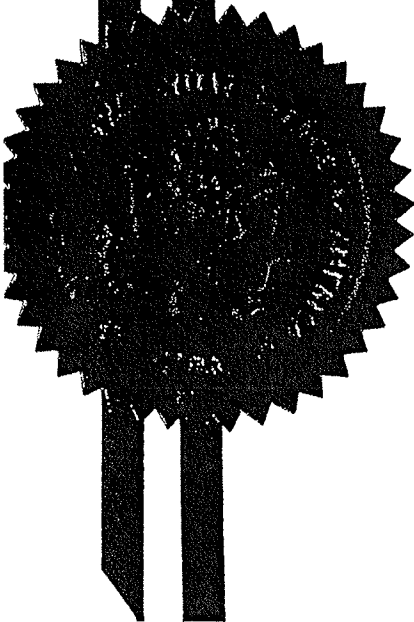
rtify under penalty of perjury under the laws of the
ned States that the foregoing is true and correct.


(Signature of Consular Officer)

S. Seth KOLB
(Typed name of Consular Officer)

Vice Consul of the United States of America
(Title of Consular Officer)

September 15, 2011
(Date)



Schweizerische Eidgenossenschaft
Confédération suisse
Confederazione Svizzera
Confederaziun svizra

28764

Federal Department of Foreign Affairs FDFA

K.252.22-USA/IRAN 02 - 4

The Federal Department of Foreign Affairs presents its compliments to the Embassy of the United States of America and refers to Cons note No. 20488 dated July 5, 2011 regarding judicial assistance and has the honor to convey following documents of the U.S. Interests Section of the Embassy of Switzerland in Tehran:

- Judicial Assistance: Lawsuit Debora D. Peterson, et al. v. the Islamic Republic of Iran et al., Case No. 10 CIV 4518.
- Note No. 1084-IE addressed to the Islamic Republic of Iran, dated July 11, 2011 and proof of service, dated July 12, 2011, as well as the certification by the Swiss Federal Chancellery dated July 20, 2011.

The section has received the above mentioned documents on July 10, 2011. It has transmitted these to the Iranian Ministry of Foreign Affairs together with its diplomatic notes on July 12, 2011. The reception of the mentioned documents was refused the same day by the Iranian Ministry of Foreign Affairs.

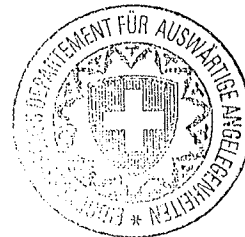
The Federal Department of Foreign Affairs avails itself of this opportunity to renew to the Embassy of United States of America the assurances of its highest consideration.

Berne, July 22, 2011

Enclosure mentioned

To the
Embassy of the
United States of America

Berne



SPECIFIC AUTHENTICATION CERTIFICATE

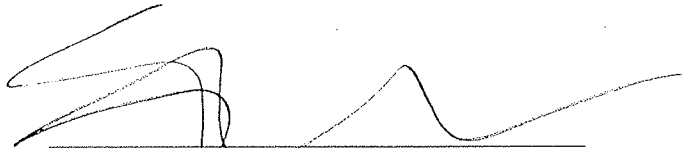
Federation of Switzerland)
, Canton of Bern) SS:
ssy of the United States of America)

I certify that the annexed document is executed by the
signature and seal of the following named official
in an official capacity, is empowered by the laws of
Switzerland to execute that document.

I certify under penalty of perjury under the laws of the
United States that the foregoing is true and correct.

Ruth EGGER

(Typed name of Official who executed the annexed document)



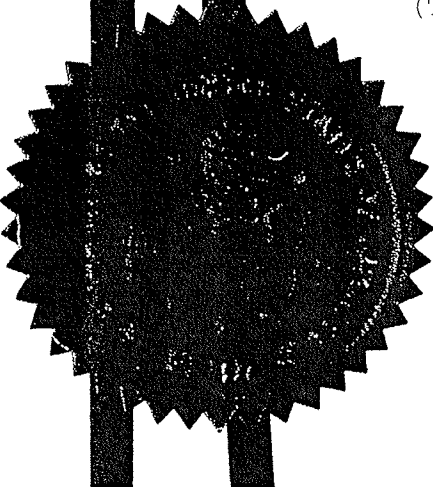
(Signature of Consular Officer)

S. Seth KOLB

(Typed name of Consular Officer)

Vice Consul of the United States of America
(Title of Consular Officer)

September 15, 2011
(Date)



Schweizerische Eidgenossenschaft
Confédération suisse
Confederazione Svizzera
Confederaziun svizra

Embassy of Switzerland in Iran

No. 1084-IE

The Embassy of Switzerland, Foreign Interests Section in Tehran presents its compliments to the Ministry of Foreign Affairs of the Islamic Republic of Iran and has the honor to refer the Ministry of Foreign Affairs of the Islamic Republic of Iran to the lawsuit Debora D. Peterson, et al. v. The Islamic Republic of Iran, et al, Case No. 10 CIV 4518, which is pending in the U.S. Federal District Court for the Southern District of New York. The Islamic Republic of Iran is a defendant in this case. The Foreign Interests Section transmits a summons and complaint herewith. The U.S. Federal District Court has requested the transmittal of these documents. This note constitutes transmittal of these documents to the Islamic Republic of Iran as contemplated in Title 28, United States Code, Section 1608 (a)(4).

Under applicable U.S. law a defendant in a lawsuit must file an answer to the complaint or some other responsive pleading within 60 days for the date of transmittal of the complaint, in this case the date of this note. Failing to do so, a defendant risks the possibility of having judgment entered against it without the opportunity to present arguments or evidence on its behalf. Therefore, the Foreign Interests Section requests that the enclosed complaint be forwarded to the appropriate authority of the Islamic Republic of Iran with a view towards taking whatever steps are necessary to avoid a default judgment.

In addition to the complaint, the Foreign Interests Section is enclosing a notice of suit, prepared by the plaintiff, which summarizes the nature of the case and includes references to U.S. laws concerning suits against foreign States.

The Foreign Interests Section has been advised that under U.S. law any jurisdictional or other defense including claims of sovereign immunity must be addressed to the court before which the matter is pending, for which reason it is advisable to consult an attorney in the United States. Otherwise, proceedings will continue without an opportunity to present arguments or evidence. It is the practice of the U.S. Department of State to be available to discuss the requirements of U.S. law with counsel. The U.S. Government is not a party to this case and cannot represent other parties in this matter.

The Embassy of Switzerland, Foreign Interests Section, avails itself of this opportunity to renew to the Ministry of Foreign Affairs of the Islamic Republic of Iran the assurances of its highest consideration.

Attachments:

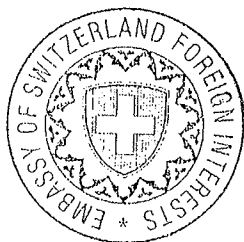
- 1 – Summons, Complaint, Notice of Suit
- 2 – Translations

Tehran, July 11, 2011

Ministry of Foreign Affairs of the
Islamic Republic of Iran

Tehran

I, Christian Winter, Head of the Foreign Interests Section of the Embassy of Switzerland in Tehran certify that this is a true copy of the diplomatic note number 1084 -IE dated July 11, 2011 and delivered to the Iranian Ministry of Foreign Affairs on July 12, 2011.




Christian Winter
Head of Foreign Interests Section

Tehran – July 12, 2011

APOSTILLE
(Convention de la Haye du 5 octobre 1961)

1. Country: SWISS CONFEDERATION

This public document

2. has been signed by Christian Winter

3. acting in the capacity of officers

4. bears the seal/stamp of

Embassy of Switzerland US Interests Section Tehran

Certified

5. at Berne

6. the 20 July 2011

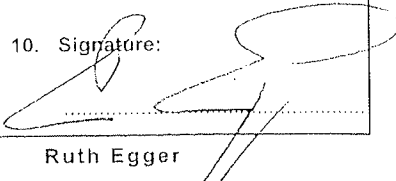
7. by Ruth Egger
functionary of the Swiss federal Chancellery

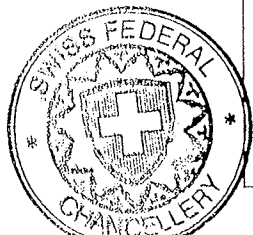
8. No 012740

9. Seal/stamp:

Swiss federal Chancellery

10. Signature:


Ruth Egger



ترجمه غیر رسمی

سفارت سوئیس

شماره IE-۱۰۸۴

سفارت سوئیس ، قسمت حافظ منافع خارجی ، در تهران با اظهار تعارفات خود به وزارت امور خارجه جمهوری اسلامی ایران احتراماً توجه آن وزارت محترم را به دعوی حقوقی اقامه شده تحت عنوان دبورا د. پیترسون و افراد دیگر علیه جمهوری اسلامی ایران و افراد دیگر که تحت پرونده شماره CIV ۴۵۱۸ ۱۰ در دادگاه بخش فدرال ایالات متحده آمریکا برای ناحیه جنوبی نیویورک مفتوح میباشد جلب مینماید . جمهوری اسلامی ایران طرف خوانده در این پرونده میباشد . قسمت حافظ منافع خارجی بنا به درخواست دادگاه فدرال ناحیه ای ایالات متحده بدینوسیله یک فقره احضاریه و شکواییه را ایفاد میدارد . برابر مقررات فصل ۲۸ بخش ۱۶۰۸ بند (الف) (۴) مجموعه قوانین ایالات متحده ، این یادداشت به منزله ابلاغ مدارک مذکور به دولت جمهوری اسلامی ایران تلقی میگردد .

طبق قوانین مربوطه ایالات متحده آمریکا ، در دعاوی حقوقی طرف خوانده باید ظرف شصت روز از تاریخ ابلاغ احضاریه و شکواییه ، که در این مورد تاریخ این یادداشت میباشد ، جوابیه و یا اظهاریه دیگری در پاسخ آن تسلیم دارد ، در غیر اینصورت امکان دارد بدون آنکه فرصت ارائه مدارک و یا دفاعیه از طرف خود را یافته باشد حکم نهایی علیه وی صادر گردد . علیهذا این قسمت خواهشمند است شکواییه پیوست را جهت هرگونه اقدام لازم به منظور جلوگیری از صدور حکم غیابی ، به مقام ذی ربط دولت جمهوری اسلامی ایران ارسال دارند .

این قسمت علاوه شکواییه فوق الاشعار یک فقره اعلامیه دادخواهی تهیه شده توسط شاکی داور بر خلاصه ماهیت پرونده و مشتمل بر رونوشتی از مجموعه قوانین ایالات متحده آمریکا در خصوص دادخواست علیه دولتهای خارجی را به پیوست ایفاد میدارد .

بدینوسیله اشعار میدارد که طبق قوانین ایالات متحده آمریکا هر گونه دفاع مربوط به قلمرو قضایی و یا دفاع دیگری از جمله عنوان نمودن مصونیت مبنی بر حاکمیت بایستی خطاب به دادگاهی صورت گیرد که موضوع در آن مفتوح میباشد و از این رو مشورت با یک مشاور حقوقی در ایالات متحده آمریکا توصیه میگردد . در غیر اینصورت سیر کار پرونده بدون آنکه فرصت ارائه شواهد و دفاعیه وجود داشته باشد ادامه پیدا خواهد کرد . وزارت امور خارجه ایالات متحده آمریکا آماده گفتگو در مورد قوانین مربوطه میباشد . دولت ایالات متحده آمریکا از طرفین این پرونده نبوده و نماینده هیچ یک از طرفین نخواهد بود .

سفارت سوئیس ، قسمت حافظ منافع خارجی ، موقع را مغتنم شمرده احترامات فائقه خود را نسبت به وزارت امور خارجه جمهوری اسلامی ایران تجدید مینماید .

تهران ، بتاريخ بیستم تیر ماه ۱۳۹۰ (۱۱ ژوئیه ۲۰۱۱)



پیوست : ۱- احضاریه ، شکواییه ، اعلامیه دادخواهی
۲- ترجمه ها

وزارت امور خارجه جمهوری اسلامی ایران
تهران